

## MEMO ENDORSED

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November 30, 2020

### VIA ECF

Hon. Kenneth M. Karas  
United States District Judge  
Southern District of New York  
United States Courthouse2  
300 Quarropas Street, Chambers 533  
White Plains, New York 10601-4150

Re: *Marie Jean Charles, et al. v. Marquis Home Care, LLC*  
Civil Case No.: 20-cv-01715 (KMK)

Dear Judge Karas:

As counsel for Defendant in the above-referenced matter, we write for all parties further to the parties' prior status updates and the Court's orders (Dkt. 29, 31) to provide a status update and respectfully request one more modification of the briefing schedule in this matter. Defendant has retrieved and analyzed the records relating to the new claimant (Dkt. 30) and anticipates making a new settlement counteroffer to all Plaintiffs today or tomorrow. The parties respectfully request three additional weeks to continue negotiations. The revised proposed deadlines are: December 18, 2020 submission of Defendant's Rule 12 motion; opposition January 8, 2021; reply January 15, 2021. The parties thank the Court for its attention to this request and continued attention to this matter. N

Respectfully submitted,

JACKSON LEWIS P.C.

Noel P. Tripp

Noel P. Tripp

NPT:dc

Enclosure

cc: Counsel of Record (via ECF)  
4823-6409-2882, v. 2

Granted -  
So Order  
12/3/20